

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BODIES OUTSIDE OF UNJUST LAWS:	)	
COALITION FOR REPRODUCTIVE JUSTICE &	)	
LGBTQ+ LIBERATION, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	No. 24-cv-3563
	)	
v.	)	Hon. Thomas M. Durkin
	)	
CITY OF CHICAGO, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**JOINT STATUS REPORT**

The parties have conferred. Plaintiffs do not intend to file an amended complaint and will proceed on their challenge to the Indemnification, Hold Harmless, and Reimbursement Provisions of Defendants' ordinance. The parties propose the following schedule:

1. To provide Defendants' counsel time to explain the Court's September 29, 2025, Memorandum Opinion and Order to Defendants and discuss next steps with them, the Defendants' Answer to the Amended Complaint shall be filed by December 12, 2025; and
2. The parties will meet for a Rule 26(f) discovery conference by January 9, 2026; and
3. The parties will submit a status report including a proposed discovery plan and dates for dispositive motions by January 16, 2026.

Dated: October 29, 2026

Respectfully submitted,

/s/ Rebecca K. Glenberg  
REBECCA K. GLENBERG  
KEVIN M. FEE, JR.  
Roger Baldwin Foundation of ACLU, Inc.  
150 N. Michigan Ave., Ste. 600  
Chicago, IL 60601  
312-201-9740  
rglenberg@aclu-il.org  
kfee@aclu-il.org

*Attorneys for Plaintiffs*

MARY B. RICHARDSON-LOWRY,  
Corporation Counsel for  
the City of Chicago

/s/ Ellen W. McLaughlin  
ANDREW W. WORSECK  
ELLEN W. MCLAUGHLIN  
KATHERINE ROSE LAMB  
City of Chicago, Department of Law  
2 North Lasalle Street, Suite 520  
Chicago, Illinois 60602  
(312) 744-7129 / 2-5147 / 2-0797  
andrew.worseck@cityofchicago.org  
ellen.mclaughlin@cityofchicago.org  
katherine.lamb@cityofchicago.org

*Attorneys for City Defendants*